

HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

RYAN RANER, an individual,

Plaintiff,

v.

THE FUN PIMPS ENTERTAINMENT,  
LLC, a Texas limited liability company;  
RICHARD HUENINK, JR., an individual;  
and JOEL HUENINK, an individual,

Defendants.

Case No. 3:22-cv-05718-TMC

STIPULATED MOTION TO CONDUCT  
DEPOSITIONS (TWO EXPERT AND ONE  
FACT WITNESS) BEYOND THE  
DISCOVERY CUTOFF

NOTE ON MOTION CALENDAR:  
February 22, 2024

THE FUN PIMPS ENTERTAINMENT,  
LLC, a Texas limited liability company,

Counterclaim Plaintiff,

v.

RYAN RANER, an individual,

Counterclaim Defendant.

**STIPULATION**

The parties jointly stipulate and respectfully move the Court for an order permitting them to conduct three depositions beyond the current deadline for discovery. The parties believe that good cause is shown for this extension for the following reasons:

- The current discovery cut-off date is February 23, 2024. (Dkt. 97.)
- Despite their diligence, the parties have been unable to conduct three remaining

depositions, namely, those of: (1) Defendants' expert, Drew Voth; (2) Plaintiff's expert, Bill Burwell; and (3) a fact witness, Lathan Meadows. Subject to the Court's approval, the parties have scheduled those depositions for February 29th, March 5th, and February 28th, respectively.

- The requested limited extension does not impact the current trial setting or any other deadlines.

The stipulated extension is not submitted for the purposes of delay, but rather due to litigation and party logistics, and is in the interest of justice and fairness. The parties respectfully request that the Court agree to the stipulated extension permitting the parties to conduct the three specified depositions after the discovery deadline and issue the proposed order submitted herewith.

RESPECTFULLY SUBMITTED: February 23, 2024.

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I certify that this memorandum contains 388 words, in compliance with the Local Civil Rules.

s/ David A. Lowe, WSBA No. 24453

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**Attorneys for Defendants**

**ORDER**

Pursuant to the Stipulation of the parties, IT IS SO ORDERED.

DATED this 23rd day of February, 2024.

A handwritten signature in black ink, appearing to read 'Tiffany M. Cartwright', is written over a solid horizontal line.

Tiffany M. Cartwright  
United States District Judge